

THE HONORABLE KYMBERLY EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

F.C. BLOXOM COMPANY
INTERNATIONAL,

Plaintiff,

vs.

HAPAG-LLOYD (AMERICA) LLC,

Defendant.

Case No. 2:25-cv-01218-KKE

STIPULATED MOTION AND ORDER
TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT AND
EXCHANGE INITIAL DISCLOSURES

Defendant Hapag-Lloyd (America) LLC removed this action to this Court on June 27, 2025. On July 25, the parties consented to Plaintiff filing an amended complaint naming Hapag-Lloyd Akitengesellschaft (“Hapag-Lloyd AG”) as the carrier of the cargo at issue and proper defendant in this action. ECF No. 11. Plaintiff filed its amended complaint naming Hapag-Lloyd AG the same day. ECF No. 12.

The Parties, by and through their undersigned counsel, hereby stipulate that the time for defendants to respond to the Amended Complaint can and should be extended to coincide with the answering deadline of carrier Hapag-Lloyd AG, so as to conserve resources and avoid staggered deadlines. That deadline will be determined upon service on Hapag Lloyd AG,

STIPULATION TO EXTEND DEADLINE TO RESPOND
TO COMPLAINT AND EXCHANGE INITIAL
DISCLOSURES - 1

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1 which the parties are actively conferring on. The parties also stipulate and agree that the
2 deadline to exchange initial disclosures should be extended from August 11 to August 25.

3 The parties respectfully submit that good cause exists because Plaintiff has now filed
4 its Amended Complaint and named the new and correct defendant. The Parties jointly request
5 that the Court endorse this stipulated extension of the deadline.

6 *I certify that this memorandum contains 184 words, in compliance with the Local Civil*
7 *Rules.*

8 **IT IS SO STIPULATED:**

9
10 CORR CRONIN LLP

SCHWABE, WILLIAMSON & WYATT,
P.C.

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12 approval)
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Attorneys for Defendant Hapag-Lloyd
(America) LLC

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20 **APPROVED AND SO ORDERED.**

21 Dated this 7th day of August, 2025.

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24 Kimberly K. Evanson
25 United States District Judge
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STIPULATION TO EXTEND DEADLINE TO RESPOND
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DISCLOSURES - 2

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